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December 4, 2001

VIA FEDERAL EXPRESS

Joe Dombrowski
Illinois Environmental Protection Agency
Remedial Project Management Section
Bureau of Land
1021 N. Grand Ave., Box 19276
Springfield, IL 62702

Re: IEPA Request for Information from Arrow Gear

Dear Mr. Dombrowski:

As you know, we have been engaged by Arrow Gear Company to assist it in responding to the IEPA's October 3, 2001 request for information regarding the Downers Grove groundwater investigation. Attached please find Arrow Gear's Responses to Information Requests as well as two boxes of documents responsive to the requests.

Should you have any questions or concerns regarding the foregoing or require any additional information, please feel free to contact me.

Very truly yours,


Angela Elbert Dietz

AED:jmo
Attachments

cc: Mike Cervinka (w/attachments)
Mark Gurnik

NGEDOCs:14107.0003:685607.1

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EPA/DOJ

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November 1, 2001

Joe Dombrowski
Illinois Environmental Protection Agency
Remedial Project Management Section
Bureau of Land
1021 N. Grand Ave., Box 19276
Springfield, IL 62702

Re: IEPA request for information from Arrow Gear

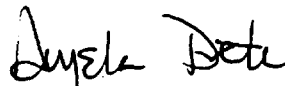
Dear Mr. Dombrowski:

We have recently been engaged by Arrow Gear Company to assist it in responding to the IEPA's October 3, 2001 request for information regarding the Downers Grove groundwater investigation.

As you know, the request is quite broad and it is taking some time to search historic records and to gather all of the information requested. While we are diligently working to fully complete your requests, we have been unable to do so thus far. We will get the responses to you as soon as possible.

Should you have any questions or concerns regarding the foregoing, please feel free to contact me.

Very truly yours,


Angela Elbert Dietz

AED:jmo

cc: Mike Cervinka (via fax)
Mark Gurnik

NGEDOCS:14107.0003:676379.1

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Arrow Gear's Responses to Information Requests

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

Michael J. Cervinka (Director of Facilities), Ronald S. Kauzlarich (Facilities Manager), David Reis (Chief Metallurgist), Larkin C. Morgan (Treasurer), Ernest D. Kauzlarich (Retired Vice President of Facilities), Mary Ann Cervinka (Personnel Manager); Arrow Gear Company, 2301 Curtiss St., Downers Grove, IL 60515, (630) 969-7640.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

See all of attached documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

See response to Information Request No. 1.

4. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances at the Facility by you, your contractors, or by prior owners and/operators.

See response to Information Request No. 1. Additionally the following people or entities may have additional information: James J. Cervinka (Chairman of the Board), Joseph L. Arvin (President), James E. Pielsticker (Executive Vice President), David Greco (former Industrial Engineer), Harry Hartzell (former Heat Treat Manager), Atif A. Odeh (former Metallurgist/EPA Coordinator), Richard H. Shapiro (former Heat Treat Supervisor), William Unterberg (retired Heat Treat Manager/Metallurgist), Stanley J. Cherney (former buyer), Robert W. Sadowski (former buyer); Arrow Gear Company, 2301 Curtiss St., Downers Grove. IL 60515, (630) 969-7640.

Nicholas J. Balodimas, President, Midwest Environmental Services (Broker), 18 E. Dundee Road, Building 4 – Suite 201, Barrington, IL 60010, (847) 304-9434; Beaver Oil Co., Inc. (Transporter and Treatment/Disposal Facility), 6037 Lenzi Ave., Hodgkins, IL 60525, (708) 354-4040; Baron Blakeslee/Allied Signal (Transporter and Treatment/Disposal Facility), 1634 S. Laramie, Cicero, IL 60650, (708) 450-3900; Adept Environmental Solutions, Inc. (Management & Engineering Services), 1100 S. Waiola Ave., LaGrange, IL 60525, (708) 352-9322; Vanguard Environmental, Inc. (Environmental & Safety Compliance Specialists), 4500 South Garnett, Suite 250, Tulsa, OK 74146, (918) 641-5588; BFI Waste Services (Special Waste Hauler, Disposal Contractor and Refuse Service), 4800 W. Lake St., Melrose Park, IL 60160, (708) 345-9090; Cozzi Iron

& Metal, Inc. (Contractor for Scrap Metal and Metal Chips), 2232 S. Blue Island Ave., Chicago, IL 60608, (773) 254-1200; Petcher Sanitation (Special Waste Oil Dri Transporter), P.O. Box 243, Litchfield, IL 62056, (217) 324-7155; Litchfield-Hillsboro Landfill (receiving facility for Oil Dri), Rt. 16 East, P.O. Box 97, Litchfield, IL 62056, (217) 324-2811; Ashland Chemical (disposal facility for Ethanol, Copper Strip, Methanol), 1817 W. Indiana Ave., South Bend, IN 46613, (219) 233-0033.

5. Describe the nature of your activities or business at the Facility, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

See Phase I report, contained in documents produced in response to Information Request No. 12.

6. State the dates during which you owned, operated, or leased the Facility, and provide copies of all documents evidencing or relating to initiation of such ownership, operation, or lease arrangements (e.g., deeds, leases, etc.).

Arrow Gear has owned and operated the Facility from 1957 to the present. See attached documents.

7. Provide information about the physical conditions at the Facility, including but not limited to the following;

- a) Property boundaries, including a written legal description;
- b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);
- c) Surface structures (e.g., buildings, tanks, etc.);
- d) Ground water wells, including drilling logs;
- e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;
- f) Any and all additions, demolitions, or changes of any kind on, under, or about the Facility, to its physical structures, or to the property itself (e.g., excavation work); and any planned additions, demolitions, or other changes to the Facility; and
- g) All maps and drawings of the Facility in your possession.

For subparts (a)-(c) and (e)-(g), see attached documents. For subpart (d), none.

8. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at the Facility. For each such solid waste management unit identified, provide the following information:

- a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

- b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;
- c) The dates that the unit was in use;
- d) The purpose and past usage (e.g., storage, spill containment, etc.);
- e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
- f) Pollutants, or contaminants, and damages resulting therefrom;
- g) The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit;
- h) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

See documents produced in response to Information Request No. 7, which include reference to four present above ground waste storage tanks and two former underground storage tanks (one of which was not used for waste storage).

The four above ground storage tanks, located in the shipping and dock area, are used for storage of non-hazardous materials. One storage tank is 11 x 4 x 3 and holds 500 gallons. The other three are 8 x 4 x 3 and hold 480 gallons each. These above ground tanks contain waste mineral spirits, waste coolant, waste oil and sludge. All four above ground tanks have been in use since early 1992. The 500 gallon present tank is constructed of steel and concrete. The three 480 gallon present tanks are constructed of double wall steel.

The former 1800 gallon tank was in use from 1967-1991 and stored waste oil and coolant. The former 1000 gallon underground storage tank was in use from 1968-1993 and stored quenching oil. These tanks were made of steel construction.

See also attached documents, including Lust Corrective Action Report dated March 26, 1993 (quench oil tank) and documents relating to abandonment of the 1800 gallon waste oil and coolant tank.

9. Identify the prior owners of the Facility. For each prior owner, further identify:

- a) The dates of ownership;
- b) All evidence showing that they controlled access to the Facility; and
- c) All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Facility during the period that they owned the Facility.

Arrow Gear is the only owner of the Facility. It has owned the Facility from 1957 to the present. The property consisted of a vacant lot prior to Arrow's purchase of the property. The prior owner of the property was Raymond T. Lopata, as Trustee of Ellsworth Park Trust No. 1114. See response and documents produced in response to Information Request No. 6. No evidence exists of any use of hazardous substance, pollutant or contaminant by the prior owner.

10. Identify the prior operators, including lessors, of the Facility. For each such operator, further identify:
- a) The dates of operation;
 - b) The nature of prior operations at the Facility;
 - c) All evidence that they controlled access to the Facility; and
 - d) All evidence that a hazardous substance, pollutant or contaminant, was released or threatened to be released at or from the Facility and /or its solid waste units during the period that they were operating the Facility.

See responses and documents produced in response to Information Requests Nos. 6 and 9.

11. Provide copies of all local, state, and federal environmental permits ever granted for the Facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).

See attached documents.

12. Provide all reports, information, or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Facility. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

See attached documents.

13. After the time You acquired the Facility, is there evidence or reason to know that any hazardous substance, contaminants, pollutants or oil was disposed of on, at or adjacent to the Facility? Describe the basis of this knowledge. Describe all investigation of the Facility you undertook prior to acquiring the Facility and all of the facts on which you based the answer to this question.

Other than the information as described in responses and documents produced in response to Information Request Nos. 8, 16 and 18, there is no further evidence that any hazardous substance, contaminants, pollutants or oil were disposed of on, at or adjacent to the Facility. This statement is based on the internal knowledge of the history of Arrow's disposal practices and all the documents in Arrow's possession. There is also no evidence of any investigation of the Facility that Arrow undertook prior to acquiring the Facility. See attached documents. See also responses and documents produced in response to Information Requests Nos. 6, 9 and 12.

14. Describe all leaks, spills or releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the Facility, including but not limited to:
- a) When such releases occurred or may occur,
 - b) How the release occurred or may occur;
 - c) What hazardous materials were released or may be released;
 - d) What amount of each such hazardous material was so released;

- e) Where such releases occurred or may occur,
- f) Any and all activities undertaken in response to, each such release or threatened release;
- g) Any and all investigations of the circumstances, nature, extent or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken; and
- h) All persons with information relating to subparts a through g of this question.

In 1971 an investigation was conducted by the IEPA about discharges of copper, cyanide and other contaminants into St. Joseph's Creek which may have caused color in the creek flow, scum on the creek flow and deposits on the creek bed. See attached documents. See also responses and documents produced in response to Information Request Nos. 8 and 16.

15. If the answer to question 14 is anything but an unqualified "no," and if any releases or threatened release identified in response to question 14 above occurred into any subsurface disposal system or floor drain inside or under your building or buildings at the Facility, identify;

- a) Where the disposal system or floor drains were located;
- b) When the disposal system or floor drains were installed;
- c) Whether the disposal system or floor drains were connected to pipes;
- d) Where such pipes were located and emptied;
- e) When such pipes were installed;
- f) How and when such pipes were replaced, or repaired; and
- g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.

See responses and documents produced in response to Information Request Nos. 7, 8 and 16.

16. Did any leaks, spills, or releases of hazardous materials occur at the Facility when such materials were being:

- a) Delivered by vendor,
- b) Stored (e.g., in any tanks, drums, or barrels);
- c) Transported or transferred (e.g., to or from any tanks, drums, barrels, or recovery units); or
- d) treated.

Yes, with respect to subparts (a) and (b). In 1988 or 1989, one 55 gallon drum of TCE was delivered with a pin hole size leak. The delivery driver had left before the leak was noticed. The minimal leak was soaked up with rags and the hole was patched. The rags were allowed to dry. The amount of leakage totaled several ounces. The leak occurred indoors on the shipping/receiving dock. The vendor was immediately notified and the leaky drum was exchanged the next day. With respect to subparts (c) and (d), no. There

have been no leaks or spills during transferring or transporting. Arrow Gear does not perform any treating.

17. If the answer to the preceding question is anything other than an unqualified "no", provide all documents relating to any such leaks, spills or releases.

See documents produced in response to Information Request No. 19.

18. Has soil ever been excavated or removed from the Facility?

- a) Amount of soil excavated;
- b) Location of excavation;
- c) Manner and place of disposal and/or storage of excavated soil;
- d) Dates of soil excavation;
- e) Identity of persons who excavated or removed the soil;
- f) Reason for soil excavation;
- g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials;
- h) All analyses or tests and results of analyses of the soil that was removed from the Facility;
- i) All persons, including contractors, with information about (a) through (h) of this request;
- j) All reports, summaries or other documentation describing the excavation.

Yes, on March 11, 1993. See Lust Corrective Action Report, produced in response to Information Request No. 8.

19. Provide records from 1972 through the present showing how much chlorinated solvent/cleaner or other chlorinated materials were purchased for the Facility. Provide records from 1972 through the present, which show how much chlorinated solvent/cleaner or other chlorinated materials were sent from the Facility to be recycled or disposed. 2 Provide the manifests showing such recycling or disposal.

See attached documents.

20. Provide all records regarding the disposal of solid waste from the Facility from 1972 to present.

See attached documents.

VERIFICATION

The foregoing responses to Information Requests are true and complete to the best of my knowledge and belief.



Michael J. Cervinka
Director of Facilities, Arrow Gear Company

Subscribed and sworn to before me
this 3rd day of December, 2001.


Notary Public

